

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

April 24, 2012

Enbridge Energy, Limited Partnership
c/o Mr. Rich Adams
Vice President, Operations
Superior City Centre
Second Floor
1409 Hammond Ave.
Superior, Wisconsin 54880

Re: Enbridge Energy, Limited Partnership's March 12, 2012 Submittal in response to the Administrative Order issued by U.S. EPA on July 27, 2010 and Supplement to the Administrative Order issued by U.S. EPA on September 23, 2010, pursuant to §311(c) of the Clean Water Act (Docket No. CWA 1321-5-10-001)

Dear Mr. Adams:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the following document submitted by Enbridge Energy, Limited Partnership, Enbridge Pipelines (Lakehead) L.L.C., Enbridge Pipelines (Wisconsin), and Enbridge Energy Partners, L.P. (herein collectively referred to as "Enbridge"):

Enbridge Energy, Limited Partnership, Oil Recovery Estimation Report, Enbridge Line 6B MP608, 3/12/2012

In the above-referenced document Enbridge states the following:

"Forensic chemical analyses now being performed and evaluated will provide more detail on the ratio of compounds related to the Line 6B release in the river sediment and these analyses are expected to further separate both natural and anthropogenic background inputs to these analyses from the Line 6B release. Therefore, the use of O&G and TPH to quantify the amount of recovered oil will overestimate the actual amount recovered, and the forensic analyses being performed will assist in documenting other sources of O&G and TPH present in the sediment."

EPA does not agree with or approve this statement. The chemical forensic activities being performed at the direction of the U.S. EPA, and as recommended by the Scientific Support Coordination Group (SSCG), are not intended to provide adjustment factors for Enbridge's estimate of oil recovered pursuant to the procedure previously coordinated between Enbridge and the U.S. EPA. The calculations used to estimate the amount of recovered oil are based on procedures, formulas and methods which were developed jointly by U.S. EPA and Enbridge and are being used for the Enbridge Line 6B MP 608 oil release. Therefore, any changes, correction

factors and/or modifications that Enbridge may propose to the U.S. EPA-approved estimation methods must be discussed with and approved by the U.S. EPA prior to use or implementation by Enbridge.

If you have any questions regarding this directive, please contact me immediately at (231) 301-0559.

Sincerely,



Ralph Dollhopf
Federal On-Scene Coordinator and Incident Commander
U.S. EPA, Region 5

cc: L. Kirby-Miles, U.S. EPA, ORC
S. Vega, U.S. EPA
M. Ducharme, MDEQ
M. DeLong, MDEQ
Records Center, U.S. EPA, Region V